

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY	:	
AND P.P.A. A. OVALLES AND	:	
WILSON OVALLES,	:	
Plaintiffs	:	
	:	
v.	:	C.A. NO. 14-137M
	:	
SONY ELECTRONICS INC.;	:	
BEST BUY CO., INC.; FOXCONN	:	
INTERNATIONAL INC.; AND	:	
JOHN DOE CORPORATIONS 1-4,	:	
Defendants	:	

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Now come the plaintiffs and hereby request a seven-day extension of time to complete their Reply Memorandum of Law in Further Support of Plaintiffs' Second Motion to Compel. As grounds for their request, plaintiffs note that at the May 9, 2016 hearing on plaintiffs' (first) Motion to Compel the plaintiffs advised the Court that depositions expected to proceed in June would likely be relevant to plaintiffs' Second Motion to Compel. The deposition of Robert McCaul [Sony Electronics director/marketing] was completed in San Jose, California on June 16, 2016 and is, in fact, pertinent to the issues before the Court. The plaintiffs have only recently received the transcript of that seven-hour deposition and request additional time in order to incorporate relevant information from that deposition into plaintiffs' Reply.

Based on the foregoing, plaintiffs respectfully request their Motion for Extension of Time and extend the due date for plaintiffs' reply brief to July 5, 2016.

Plaintiffs,
By their Attorneys,

/s/ Miriam Weizenbaum
Miriam Weizenbaum (#5182)
DeLUCA & WEIZENBAUM, LTD.
199 North Main Street
Providence, RI 02903
(401) 453-1500
(401) 453-1501 Fax
miriam@dwlaw.us

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY	:	
AND P.P.A. A. OVALLES AND	:	
WILSON OVALLES,	:	
	:	
v.	:	C.A. NO. 14-137M
	:	
SONY ELECTRONICS INC.;	:	
BEST BUY CO., INC.; FOXCONN	:	
INTERNATIONAL INC.; AND	:	
JOHN DOE CORPORATIONS 1-4,	:	

CERTIFICATE OF SERVICE

I hereby certified that a true and accurate copy of the following document:

Plaintiffs' Motion for Extension of Time

was sent by electronic mail on this 28th day of June 2016 to the following counsel of record:

William J. Ronalter, Esq.
James W. Bergenn, Esq.
Mark K. Ostrowski, Esq.
Shipman & Goodwin, LLP
One Constitution Plaza
Hartford, CT 06103
Counsel for Wanda Ovalles and A. Ovalles

Robert J. Hafner, Esq.
Eckert, Seamans, Cherin & Mellott, LLC.
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102
Counsel for Sony Electronics and Best Buy

John Kelleher, Esq.
Higgins, Cavanagh & Cooney, LLP
The Hay Building, 4th Floor
123 Dyer Street
Providence, RI 02903
Counsel for Sony Electronics and Best Buy

James M. Campbell, Esq.
David M. Rogers, Esq.
Diana A. Chang, Esq.
Campbell, Campbell, Edwards & Conroy
One Constitution Plaza
Boston, MA 02129
Counsel for Sony Electronics

Thomas C. Angelone, Esq.
Hodosh, Spinella & Angelone
One Turks Head Place, Ste. 810
Providence, RI 02903
Counsel for Foxconn International, Inc.

/s/ Miriam Weizenbaum